

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

IN RE:) **CASE NO. BK 10-80444**
LUND, MARK T)
NIGRIN, CHRISANN M) **CHAPTER 7**
)
Debtor(s).)

**APPLICATION TO EMPLOY ATTORNEYS FOR
TRUSTEE UNDER GENERAL RETAINER**

TO: THE BANKRUPTCY JUDGES FOR THE DISTRICT OF NEBRASKA

The application of Richard D. Myers respectfully represents:

1. Your applicant is the Trustee of the estate of the above-named debtor having been duly appointed and qualified, and he is now acting as such Trustee.

2. Applicant wishes to employ the law firm of McGill, Gotsdiner, Workman & Lepp, P.C., L.L.O., First National Plaza – Suite 500, 11404 West Dodge Road, Omaha, Nebraska 68154-2584, consisting of R. Thomas Workman, Gary M. Gotsdiner, Robert L. Lepp, Keith A. Green, Mark A. Pieper, Mary L. Hewitt, Sam King, Christina M. Fink, Erin R. Harris, Nate Watson, Richard D. Myers, Nancy A. Roberts, Steven J. Woolley, Janice M. Woolley, Myron J. Kaplan, William E. Mooney, Ronald R. Volkmer and G. Michael Fenner attorneys and counselors at law, duly admitted to practice in the State of Nebraska and this Court as his attorneys herein.

3. The applicant has selected McGill, Gotsdiner, Workman & Lepp, P.C., L.L.O., for the reason that they have considerable experience in matters of this nature, and the applicant believes that the law firm of McGill, Gotsdiner, Workman & Lepp, P.C., L.L.O. is well qualified to engage in the activities for which the law firm is to be retained to represent him in this proceeding.

4. The professional services that McGill, Gotsdiner, Workman & Lepp, P.C., L.L.O. are to render are as follows:

- (a) To conduct examination of the debtor and witnesses to ascertain the extent and nature of the assets, recoverable transfers, and liabilities, to advise your applicant in the premises.
- (b) To prepare on behalf of the applicant necessary applications, answers, orders, reports and other papers.
- (c) To perform all other legal services for the applicant which may be necessary herein.

5. It is necessary for the applicant to employ legal counsel because skill and professional legal services are required for the institution, prosecution and handling of a variety of legal proceedings on behalf of this estate.

6. The applicant desires to employ McGill, Gotsdiner, Workman & Lepp, P.C., L.L.O. as counsel because of the extent of legal services required.

7. To the best of the applicant's knowledge, McGill, Gotsdiner, Workman & Lepp, P.C., L.L.O. and the aforementioned attorneys have no connection with the debtor, the creditors or any other party in interest except as disclosed in the accompanying affidavit, and represent no interest adverse to the Trustee of the estate in the matters upon which it or they are engaged, and their employment would be in the best interest of this estate.

WHEREFORE, your applicant prays that he be authorized to employ and appoint the said law firm of McGill, Gotsdiner, Workman & Lepp, P.C., L.L.O. as his attorneys under a general retainer, and that he have such other and further relief as is just.

Date: November 23, 2010.

/s/ Richard D. Myers

RICHARD D. MYERS, Trustee

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was served electronically by filing in the court's CM/ECF system this November 23, 2010.

/s/Diane M. Wilson

Diane M. Wilson

Assistant to Richard D. Myers, Trustee